

Mosa M. Mathurin

From: Kelvin Vidale <kelvin.vidale@boc.vi.gov>
Sent: Wednesday, March 3, 2021 4:09 PM
To: Eric Balaban <ebalaban@aclu.org>
Cc: Mosa M. Mathurin <Mosa.Mathurin@boc.vi.gov>; Samantha Weaver <sweaver@aclu.org>; Carol Jacobs <Carol.Jacobs@vi.gov>
Subject: Re: [EXTERNAL MAIL]RE: proposed protective order

When do you think you will get back to us?

The general confidentiality section was a throw back to the representations you made last year regarding the violation of the confidentiality on an investigative report and included in the proposal as a way to prevent something like that from recurring. No other document has been marked as confidential by us.

From: Eric Balaban <ebalaban@aclu.org>
Sent: Wednesday, March 3, 2021 4:05 PM
To: Kelvin Vidale <kelvin.vidale@boc.vi.gov>
Cc: Mosa M. Mathurin <Mosa.Mathurin@boc.vi.gov>; Samantha Weaver <sweaver@aclu.org>; Carol Jacobs <Carol.Jacobs@vi.gov>
Subject: [EXTERNAL MAIL]RE: proposed protective order

Hi Kelvin:

We will confer as a team about your proposal, but will not be able to get back to you by the close of business today. We will, however, agree, to not publicly disseminate the videos we requested that you have agreed to send to us by Friday. We do not believe any other documents you agreed to send to us by Friday that are subject to our requests are covered by the proposed protective order, but please do let us know if you disagree.

Eric Balaban*
senior staff counsel
ACLU National Prison Project
915 15th St., N.W.
Seventh Floor
Washington, D.C. 20005
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*not admitted in D.C., practice limited to the federal courts

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From: Kelvin Vidale <kelvin.vidale@boc.vi.gov>
Sent: Wednesday, March 3, 2021 1:10 PM
To: Eric Balaban <ebalaban@aclu.org>
Cc: Mosa M. Mathurin <Mosa.Mathurin@boc.vi.gov>; Samantha Weaver <SWeaver@aclu.org>; Carol Jacobs <Carol.Jacobs@vi.gov>
Subject: Re: proposed protective order

I am sending an updated version of the proposed stipulated protective order. Could you get back to me with any feedback before close of business today?

From: Kelvin Vidale <kelvin.vidale@boc.vi.gov>
Sent: Wednesday, March 3, 2021 10:14 AM
To: Eric Balaban <ebalaban@aclu.org>
Cc: Mosa M. Mathurin <Mosa.Mathurin@boc.vi.gov>; Samantha Weaver <sweaver@aclu.org>; Carol Jacobs <Carol.Jacobs@vi.gov>
Subject: Re: proposed protective order

Dear Eric:

Could you advise on the attachment?

From: Eric Balaban <ebalaban@aclu.org>
Sent: Sunday, April 5, 2020 11:33 AM
To: Vidale, Kelvin <kvidale@boc.vi.gov>
Cc: Carol Jacobs <Carol.Jacobs@vi.gov>; Curtis Harris <Curtis.Harris@aclu.org>; Samantha Weaver <SWeaver@aclu.org>; Geraldine P. Vaval, Esq. (gvaval@boc.vi.gov) <gvaval@boc.vi.gov>; rfaulkner@boc.vi.gov <rfaulkner@boc.vi.gov>; Wynnie Testamark <WTestamark@boc.vi.gov>; David Bogard <dbogard@pulitzerbogard.com>; Kathy Burns Bill Hill <burnshill@gmail.com>
Subject: proposed protective order

Dear Kelvin:

Please find attached a proposed protective order to address Defendants' concerns regarding investigative reports produced in this case. Please send me any proposed edits and revisions, or let me know if this is satisfactory.

Eric Balaban*
senior staff counsel
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